

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CELESTE J. MATTINA, Regional Director, Region 2,  
National Labor Relations Board, for and on behalf of the  
NATIONAL LABOR RELATIONS BOARD,

Petitioner,

vs.

KINGSBRIDGE HEIGHTS REHABILITATION  
AND CARE CENTER,

Respondent.

**DECLARATION OF HELEN  
SIEGER**

**Civil Action No:  
08-CV-6550 (DLC)  
ECF CASE**

I, HELEN SIEGER, hereby declare, under penalty of perjury, pursuant to 28 U.S.C. §1746:

1. I am the Owner and Facility Operator for Respondent Kingsbridge Heights Rehabilitation and Care Center ("Kingsbridge"). I submit this Declaration pursuant to the Court's August 14, 2008 Order.
2. The information requested by the Union was provided to the Union on or about August 20, 2008.
3. Striking bargaining unit employees were returned to work on August 21, 2008.
4. Any contracts with individual employees, referred to in the Order as "yellow dog" contracts, were rescinded prior to the filing of the Petition in this case.
5. Kingsbridge is willing to meet with the Union under the auspices of the Federal Mediation and Conciliation Service for purposes of negotiations and will contact FMCS to schedule a meeting.
6. Access to the facility was provided to the Union on August 21, 2008.
7. Benefit fund contributions are not yet due under the terms of the Order.

8. A copy of the Court's Order has been posted at Kingsbridge's facility. Kingsbridge has yet to receive Spanish and Polish language copies of the Order from the NLRB for posting.

**EXECUTED ON THE 3RD DAY OF SEPTEMBER, 2008.**

  
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HELEN SIEGER